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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
SHIPCO TRANSPORT INC.	:
	:
Plaintiff,	:
	:
-against-	:
	:
JDB INTERNATIONAL INC. and	:
LAPTON FREIGHT INTERNATIONAL	:
LIMITED,	:
	:
Defendants.	:
-----X	

09 cv 7532 (CM)  
ECF CASE

**DEFENDANT'S NOTICE OF MOTION TO DISMISS  
PLAINTIFF'S AMENDED COMPLAINT**

Upon the annexed Declaration of Chung Wai Ling, Cara, the exhibits attached thereto, and the accompanying Memorandum of Law, and pleadings heretofore had herein, Defendant Lapton Freight International Inc. will move this Court before the Honorable Colleen McMahon, United States Courthouse, 500 Pearl Street, Courtroom 14-C, New York, New York for an order pursuant to Federal Rules of Civil Procedure Rule 12(b)(6) dismissing Plaintiff's Amended Complaint dated June 18, 2010 in its entirety, and for such other and further relief as this Court deems just and equitable.

Dated: August 13, 2010

LAPTON FREIGHT INTERNATIONAL, INC.

By: Anne C. LeVasseur  
Patrick F. Lennon (PL2162)  
Anne C. LeVasseur (AL3333)  
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**AFFIRMATION OF SERVICE**

I hereby certify that on August 13, 2010, a copy of the foregoing Notice of Motion to Dismiss Plaintiff's Amended Complaint was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

By: Anne C. LeVasseur  
Anne C. LeVasseur